



The Chemical Company

Helping Make  
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Date: August 10, 2005

Arthur Neal, Director, Program Administration  
National Organic Program  
USDA-AMS-TMP-NOP  
1400 Independence Ave., SW., Room 4008  
So. Ag Stop 0268  
Washington, DC 20250

Via E-mail:

Via Fax: (202) 205-7808

The following comments are in reference to USDA, Agricultural Marketing Service Docket Number TM-04-07 concerning 7 CFR Part 205, National Organic Program Sunset Review process.

BASF Corporation thanks the United States Department of Agriculture and the National Organic Standards Board for the opportunity to comment on the Sunset Review of the 2002 National List. We support the list as published, and would like to especially support the following materials:

1. Tocopherols, Ascorbic acid, Vitamin A, as well as any synthesized materials in the approved list
2. National List Section – See 205.605 for all the above mention substances as listed for alternative use.

BASF manufactures the materials above mentioned according to USDA organic regulation. In many cases, such as tocopherols, Ascorbic Acid... the molecular structure, chemical compositions are equivalent to the naturally occurring substances, yet can not be produced by any other matter than that of a synthetic process due to lack of technology advances or isolation of the substances could not be accomplished in its' natural state.

Tocopherol is a vital component for fortification of dairy products to meet shelf life requirements of the product. If it were to be removed from the organic list, dairy products such as milk (low fat, no fat) could not be accomplished according to current FDA regulation.

Please consider our petition to keep the current NOSB list with the above substances as approved for organic product use.

Sincerely,

Josefina Infantas, MSM  
BASF Corporation  
Regulatory Affairs Supervisor  
973.245.6364  
infantj@basf-corp.com